

# **EXHIBIT K**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JARROD STRINGER, ET AL.,	§	
<i>Plaintiffs,</i>	§	
	§	
V.	§	NO. 5:16-cv-00257
	§	
CARLOS H. CASCOS, IN HIS OFFICIAL CAPACITY	§	
AS THE TEXAS SECRETARY OF STATE AND	§	
STEVEN C. MCCRAW, IN HIS OFFICIAL CAPACITY	§	
AS THE DIRECTOR OF THE TEXAS DEPARTMENT OF	§	
PUBLIC SAFETY,	§	
<i>Defendants.</i>	§	

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**DEFENDANTS' INITIAL DISCLOSURES**

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TO: Plaintiffs, Jarrod Stringer, et al., by and though their counsel of record, Peter A. Kraus, Charles S. Siegel, and Caitlyn E. Silhan, Waters & Kraus, LLP, 3219 McKinney Avenue, Dallas, Texas 75204, and Mimi M.D. Marziani and Hani Mirza, Texas Civil Rights Project, 1405 Montopolis Drive, Austin, Texas 78741.

Defendants, Carlos H. Cascos, in his official capacity as Texas Secretary of State, and Steven C. McCraw, in his official capacity as Director of the Texas Department of Public Safety, (“Defendants”), submit Initial Disclosures pursuant to FED. R. Civ. P. 26(a)(1). Defendants reserve the right to supplement these Disclosures as additional discovery, investigation, and analysis may warrant. Defendants do not waive any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity. Defendants likewise do not waive the right to object, on any and all grounds, to (1) the evidentiary use of the information contained in these Disclosures; and (2) any discovery requests relating to these Disclosures. In particular, Defendants have a pending Motion to Dismiss on file with the Court, which may dispose of this case or limit the scope of discovery therein, and reserve the right to object to discovery in this cause on the bases discussed therein.

**A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information;**

**Response:**

1. Keith Ingram  
Director, Elections Division  
Texas Office of the Secretary of State  
P.O. Box 12060  
Austin, Texas 78711  
512-463-5650

Mr. Ingram has knowledge of the Secretary of State's voter registration procedures.

2. Sheri Gipson  
Deputy Assistant Director, Customer Support  
Driver License Division  
Texas Department of Public Safety  
P.O. Box 4087  
Austin, Texas 78773  
512-424-2000

Ms. Gipson is familiar with DPS processes and Motor Voter provisions.

3. John Crawford  
Applications Manager, Licensing Services  
Information Technology Division  
Texas Department of Public Safety  
P.O. Box 4087  
Austin, Texas 78773  
512-424-2000

Mr. Crawford is familiar with the manner in which the Department of Public Safety provides data to the Office of Secretary of State.

Defendants may rely on any individuals identified by the Plaintiffs in their Disclosures and may supplement this response as further individuals are identified during discovery.

**B. A copy of, or a description by category and location of all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;**

**Response:**

Defendants refer Plaintiffs to the documents provided during the parties' pre-litigation correspondence, as well as their respective websites.

**C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and**

**Response:**

Not applicable. Defendant is not claiming damages.

**D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

**Response:**

None.

**E. A party shall disclose to other parties the identity of any person who may be used in trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence.**

**Response:**

Defendants have not decided whether to employ the services of any expert witnesses. Defendants reserve the right to call experts if they are determined to be necessary in this case, and will make that determination in compliance with the Court's scheduling order in this matter.

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

JEFFREY C. MATEER  
First Assistant Attorney General

BRANTLEY STARR  
Deputy First Assistant Attorney General

JAMES E. DAVIS  
Deputy Attorney General for Civil Litigation

ANGELA V. COLMENERO  
Chief, General Litigation Division

/s/Anne Marie Mackin  
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ATTORNEYS DEFENDANTS

**CERTIFICATE OF SERVICE**

I certify that on this the 7th day of June, 2016, a true and correct copy of the foregoing was sent via electronic mail to:

Caitlyn E. Silhan  
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Mimi Marziani  
mimi@texascivilrightsproject.org

Hani Mirza  
hani@texascivilrightsproject.org

ATTORNEYS FOR PLAINTIFFS

/s/Anne Marie Mackin  
Assistant Attorney General